

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
ALYSON AULET,

Index No.:

PLAINTIFF,

VERIFIED COMPLAINT

-AGAINST-

HOLDER TRANSPORT INC. AND KENROY
WEBSTER,

DEFENDANTS,

-----X
Plaintiff, by her attorneys, HELEN F. DALTON & ASSOCIATES, P.C., complaining of
Defendants, respectfully alleges, upon information and belief, as follows:

AS AND FOR A FIRST CAUSE OF ACTION
ON BEHALF OF PLAINTIFF ALYSON AULET

1. At all times herein mentioned, Plaintiff, **ALYSON AULET**, was, and still is, a resident of the County of Bronx, State of New York.
2. At all times herein mentioned, Defendant, **HOLDER TRANSPORT INC.**, was, and still is, a domestic business corporation duly organized and existing under the laws of the State of New York.
3. At all times herein mentioned, Defendant, **HOLDER TRANSPORT INC.**, was, and still is, a foreign corporation duly organized and existing under the laws of the State of New York.
4. At all times herein mentioned, Defendant, **HOLDER TRANSPORT INC.**, maintained its principal office and place of business in the County of Long, State of Georgia, located at 88 Enclave Way NE, Ludowici, GA 31316.
5. At all times herein mentioned, Defendant, **KENROY WEBSTER**, was, and still is,

a resident of the County of Broward, State of Florida.

6. At all times herein mentioned, Defendant, **HOLDER TRANSPORT INC.**, was the owner of a 2015 Freightliner, motor vehicle bearing Georgia State license plate number EY1699.

7. At all times hereinafter mentioned, Defendant, **KENROY WEBSTER**, operated the aforementioned motor vehicle bearing Georgia State license plate number EY1699

8. At all times hereinafter mentioned, Defendant, **KENROY WEBSTER**, operated the aforementioned motor vehicle with the permission of Defendant, **HOLDER TRANSPORT INC.**

9. At all times hereinafter mentioned, Defendant, **KENROY WEBSTER**, operated the aforementioned motor vehicle with the knowledge of Defendant, **HOLDER TRANSPORT INC.**

10. At all times hereinafter mentioned, Defendant, **KENROY WEBSTER**, operated the aforementioned motor vehicle with the consent of Defendant, **HOLDER TRANSPORT INC.**

11. At all times herein mentioned, Defendant, **KENROY WEBSTER**, operated the aforementioned motor vehicle in the scope of their relationship with Defendant, **HOLDER TRANSPORT INC.**

12. At all times hereinafter mentioned, Defendant, **HOLDER TRANSPORT INC.**, managed the aforementioned motor vehicle.

13. At all times hereinafter mentioned, Defendant, **KENROY WEBSTER**, managed the aforementioned motor vehicle.

14. At all times hereinafter mentioned, Defendant, **HOLDER TRANSPORT INC.**, maintained the aforementioned motor vehicle.

15. At all times hereinafter mentioned, Defendant, **KENROY WEBSTER**, maintained the aforementioned motor vehicle.

16. At all times hereinafter mentioned, Defendant, **HOLDER TRANSPORT INC.**,

controlled the aforementioned motor vehicle.

17. At all times hereinafter mentioned, Defendant, **KENROY WEBSTER**, controlled the aforementioned motor vehicle.

18. At all times hereinafter mentioned, Plaintiff, **ALYSON AULET**, was the operator of a 2016 Audi motor vehicle bearing New York State license plate number KXD1700.

19. At all times hereinafter mentioned, on or about Northbound Bruckner Expressway at or near its intersection with Triboro Bridge Exit Ramp, County of Bronx, State of New York, was a public roadway and/or thoroughfare used by the public generally.

20. That on or about July 25, 2022, Defendant, **KENROY WEBSTER**, was operating the motor vehicle owned by Defendant, **HOLDER TRANSPORT INC.**, at the aforementioned location.

21. That on or about July 25, 2022, Plaintiff, **ALYSON AULET**, was operating her motor vehicle at the aforementioned location.

22. That on or about July 25, 2022, at the aforementioned location, the motor vehicle owned by Defendant, **HOLDER TRANSPORT INC.**, and operated by Defendant, **KENROY WEBSTER**, came into contact with the motor vehicle operated by Plaintiff, **ALYSON AULET**, at the aforementioned location.

23. That, as a result of the aforementioned contact, Plaintiff, **ALYSON AULET**, was injured.

24. That the aforementioned contact was caused wholly and solely by reason of the negligence of Defendants without any fault or negligence on the part of Plaintiff contributing thereto.

25. That Defendants were negligent, careless, and reckless in the ownership, operation, management, maintenance, supervision, use, and control of the aforesaid vehicle and Defendants were

otherwise negligent, careless, and reckless in the premises.

26. That by reason of the foregoing, Plaintiff, **ALYSON AULET**, sustained severe and permanent personal injuries and was otherwise damaged.

27. That Plaintiff, **ALYSON AULET**, sustained serious injuries as defined in Subdivision d of § 5102 of the Insurance Law-Recodification.

28. That Plaintiff, **ALYSON AULET**, sustained serious injuries and economic loss greater than basic economic loss as to satisfy the exceptions of § 5104 of the Insurance Law.

29. That Plaintiff, **ALYSON AULET**, is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. Plaintiff is only seeking to recover those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

30. That this action falls within one or more of the exceptions as set forth in CPLR § 1602.

31. That by reason of the foregoing, Plaintiff, **ALYSON AULET**, has sustained damages in an amount, which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction over her action.

AS AND FOR A SECOND CAUSE OF ACTION ON BEHALF OF
PLAINTIFF ALYSON AULET FOR PROPERTY DAMAGE

32. Plaintiff, **ALYSON AULET**, repeats, reiterates and re-alleges each and every allegation contained in the First Cause of Action with the same force and effect as though same, more fully set forth at length herein.

33. That at all times herein mentioned Plaintiff, **ALYSON AULET**, was the owner of the aforementioned motor vehicle bearing New York State license plate number KXD1700.

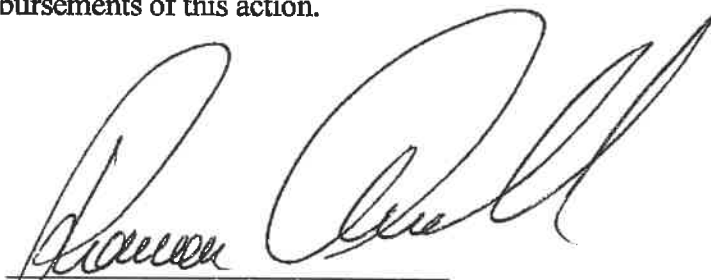
34. That Plaintiff, **ALYSON AULET**, motor vehicle was rendered unusable and

valueless as a result of the aforementioned collision.

35.. That solely by reason of the foregoing, Plaintiff, **ALYSON AULET**, has sustained money damages in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction over this action.

WHEREFORE, Plaintiff, **ALYSON AULET**, demands judgment on the First and Second Causes of Action against Defendants in an amount this court deems fair, just, and reasonable under the circumstances, together with costs and disbursements of this action.

Dated: Kew Gardens, NY
August 11, 2022



Roman Avshalumov, Esq.
Helen F. Dalton & Associates, P.C.
Attorneys for Plaintiff
ALYSON AULET
80-02 Kew Gardens Road, Suite 601
Kew Gardens, NY 11415
Tel:(718) 263-9591
File No. 2022-0198

TO:
HOLDER TRANSPORT INC.
88 Enclave Way NE,
Ludowici GA 31316

KENROY WEBSTER
1931 Lyons Road, Apt. 204,
Coconut Creek FL 33063

PLAINTIFF'S VERIFICATION

STATE OF NEW YORK

SS:

COUNTY OF Queens

Allyson Aulet, being duly sworn say: I am a **PLAINTIFF** in
the action herein and I have read the annexed


Summons & Complaint

I know the contents thereof, and the same are true to my knowledge, except those matters therein
which are stated to be alleged upon information and belief, and as to those matters, I believe
them to be true. My belief as to those matters therein not stated upon knowledge is based upon
facts, records, and other pertinent information contained in my personal files.


PLAINTIFF'S SIGNATURE

Sworn to before me this

11 day of Aug., 2022


NOTARY PUBLIC, State of New York
No. 01JA507017
Qualified in Queens County
Commission Expires April 28, 2023

Index No.:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

ALYSON AULET,

Plaintiff,

-against-

HOLDER TRANSPORT INC. AND KENROY WEBSTER,

Defendants,

SUMMONS AND VERIFIED COMPLAINT

Helen F. Dalton & Associates, P.C.
Attorneys for Plaintiff
80-02 Kew Gardens Road, Suite 601
Kew Gardens, NY 11415
(718) 263-9591

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